

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re:)	
)	
Office of Engineering and Technology)	
Invites Comments on Technological Advisory)	ET Docket No. 13-101
Council ("TAC") White Paper and)	
Recommendations for Improving Receiver)	
Performance)	

To the Commission:

**INFORMAL REQUEST FOR COMMISSION
ACTION IN THE NATURE OF A MOTION FOR EXTENSION
OF TIME AND CONSENT TO MOTION FOR EXTENSION OF TIME**

COMES NOW the undersigned, JAMES EDWIN WHEDBEE, who pursuant to Sections 1.41 and 1.46(b) of the Commission's rules and regulations [47 C.F.R. §§ 1.41, 1.46(b)] respectfully requests the Commission enlarge and extend the time within which comments and reply comments may be filed in the above-captioned proceeding. In this connection, the undersigned likewise concurs with the Motion for Extension of Time filed by the CEA, NAB, and GPSIA dated May 29, 2012 ("motion" hereinafter) and consents to the Commission granting same. As good cause for his request, the undersigned states...

1. In the Commission's Public Notice, entitled, "*Office of Engineering and Technology Invites Comments on Technological Advisory Council ("TAC") White Paper and Recommendations for Improving Receiver Performance*," DA 13-801 (rel. Apr. 22, 2013), 28 FCC Rcd 5274, 78 FR 26777 ("Public Notice" hereinafter), the Commission invites public comments and reply comments regarding possible implementation of the Technological Advisory Council's ("TAC" hereinafter) White Paper entitled, "*Interference Limits Policy – The use of Harm Claim Thresholds to Improve the Interference Tolerance of Wireless Systems*" ("White Paper" hereinafter), citing Sections 1.415 and 1.419 of the Commission's rules and regulations (47 C.F.R. §§ 1.415, 1.419), even though the above-captioned proceedings aren't rulemaking proceedings. The Public Notice sets a June 21, 2013 comment deadline and a July 8, 2013 reply comment deadline.

2. Because the above-captioned proceedings aren't rulemaking proceedings, this is an informal request for Commission action in the nature of a motion for extension of time relying on Section 1.41 of the Commission's rules (47 C.F.R. § 1.41). A motion has already been submitted by CEA, NAB, and GPSIA. Both this request and the motion rely upon Section 1.46(b) of the Commission's rules [47 C.F.R. § 1.46(b)]. However, because the Commission issued its Public Notice in reliance upon Section 1.415 of the rules (47 C.F.R. § 1.415), it is worth noting that subsections (b) and (c) thereof require a reasonable time be afforded for comments and reply comments.

3. In its broadest application, the White Paper touches and concerns nearly every radio service. The White Paper also introduces novel regulatory approaches which require additional study, including study of the Commission's intentions (i.e.: <http://www.fcc.gov/events/workshop-spectrum-efficiency-and-receivers-day-1>) as discussed in recent workshops. Because the Commission requests cost-benefit analyses, manufacturers of radio receivers and equipment, together with user groups who aid in the development thereof, it is reasonable that an extension of time be granted, and likely impossible for those parties to fully inform their comments and/or reply comments by the currently scheduled deadlines.

4. The Commission has previously granted requests for extension of time when required, as in this situation, to ensure that the Commission receives informed and well-grounded responses and that all parties have a fair and reasonable opportunity to submit comments and reply comments into the record [See *In the Matter of LightSquared Subsidiary LLC, Request for Modification of Its Authority for an Ancillary Terrestrial Component*, Order, SATMOD-20101118-00239, 25 FCC Rcd 16267 (2010) (granting one-week extension due to Thanksgiving weekend); *Wireless Telecommunications Bureau Grants Extension of Time to File Reply Comments on Commercial Mobile Radio Services Market Competition*, Public Notice, WT Docket No. 09-66, DA 09-1419 (WTB rel. June 24, 2009) (granting 14-day extension for "development of a complete record on the issues"); *In the Matter of Amendment of the*

Commission's Rules to Establish New Personal Communications Services, Narrowband PCS; Implementation of Section 309(j) of the Communications Act - Competitive Bidding, Narrowband PCS, Order, 15 FCC Rcd 10925 (2000) (granting 30-day extension).]

5. An extension of at least thirty (30) days, such that the earliest deadline for comments is July 22, 2013 and the earliest deadline for reply comments is August 8, 2013, would be reasonable and ensure development of a full and fair record in these proceedings; accordingly, good cause exists to grant of the motion and/or this informal request. Of course, an extension of time for comments and reply comments beyond thirty (30) days would be appreciated.

WHEREFORE, the foregoing considered, the undersigned respectfully requests the Commission grant the motion and/or this informal request and extend the comment and reply comment by at least thirty (30) days.

Respectfully submitted,

May 31, 2013



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